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Proposed Co-Counsel to Victory Park Management, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

PAPER SOURCE, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 21-30660 (KLP)

(Joint Administration Requested)

**MOTION PURSUANT TO
LOCAL RULE 2090-1(E)(3) FOR ADMISSION *PRO HAC VICE***

Darius K. Davenport (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and a Partner with Crenshaw, Ware & Martin, PLC, hereby moves the Court, pursuant to this motion (the “Motion”), for the entry of an order, substantially in the form of **Exhibit A**, authorizing Peter A. Siddiqui (“Mr. Siddiqui”), a Partner in the law firm of Katten Muchin Rosenman LLP, 525 West Monroe St., Chicago, IL 60661, to appear and practice *pro hac vice* on behalf of Victory Park Management, LLC, in the above-captioned chapter 11 cases now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related adversary litigation pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are set forth in the Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief. The location of the Debtors’ service address is 250 Vesey Street, 22nd Floor, New York, New York 10281.

Rules”). In support of the Motion, Movant states as follows:

1. Mr. Siddiqui is admitted, practicing, and in good standing as a member of the bar of the State of Illinois. He is admitted to practice before the United States Courts of Appeals for the Seventh Circuit, and the United States District Courts for the Northern District of Illinois, the Central District of Illinois, the District of Colorado and the District of New Hampshire. There are no disciplinary proceedings pending against Mr. Siddiqui.

2. Pursuant to Local Rule 2090-1(E)(3), “[a]n attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar. Applicants for *pro hac vice* admission shall complete a written application, which shall be appended to and incorporated by reference in the aforesaid motion.”

3. Movant requests the Court allow Mr. Siddiqui to appear at hearings in these chapter 11 cases.

4. Movant has provided notice of this Motion to all persons receiving electronic notice in these chapter 11 cases.

5. An application pursuant to Local Rule 2090-1(E)(3)(a) is attached hereto as **Exhibit**

B.

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WHEREFORE, Victory Park Management, LLC. respectfully requests that the Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Richmond, Virginia
Dated: March 2, 2021

/s/ Darius K. Davenport

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